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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:

Ruben Carlos Garcia §
AND § CASE NO. 19-70191-HDH-13
Brandy Carol Garcia §
Debtors §

**DEBTOR'S MOTION TO ALLOW PAYMENT ON
LATE-FILED CLAIM OF TITLE MAX**

Come now Debtors in the above-entitled cause and file this Motion to Allow Payment on Late Filed Claim filed in this matter by Title Max and would respectfully show the Court as follows:

1. Debtors' attorney filed an Secured claim on behalf of Title Max for \$1,500.00 .
2. The claim was filed after the expiration of the 70 day claims bar date in this case.
3. This debt is for a 2008 Scion XD and debtors believe that payment through the Chapter 13 plan is in his and her best interest.
4. Debtors' most recent preliminary plan provides treatment for this claim.

FOR THESE REASONS, Debtors pray that the late-filed Secured claim for \$1,500.00 to Title Max is allowed to be paid pursuant to the Chapter 13 plan.

Respectfully submitted,

/s/Monte J. White
ATTORNEY FOR DEBTORS

IMPORTANT NOTICE

PURSUANT TO LOCAL BANKRUPTCY RULE 9007, YOU ARE HEREBY NOTIFIED THAT NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT ON OR BEFORE TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE MUST BE FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING WILL BE HELD WITH NOTICE TO (1) THE DEBTOR AND DEBTOR'S ATTORNEY; (2) THE OFFICE OF THE U.S. TRUSTEE; (3) ANY TRUSTEE AND THE TRUSTEE'S ATTORNEY; (4) THE MEMBERS OF ANY OFFICIAL COMMITTEE, OR THE ATTORNEY FOR ANY OFFICIAL COMMITTEE IF AN ATTORNEY HAS BEEN EMPLOYED; OR,

IF THERE IS NO COMMITTEE, THE TWENTY (20) LARGEST UNSECURED CREDITORS; (5) ANY PARTY REQUESTING NOTICE; (6) ANY PARTY NAMED ON A COURT-APPROVED ALTERNATIVE SERVICE LIST; (7) THE RESPONDING PARTIES; AND (8) ANY OTHER AFFECTED ENTITY.

IF NO HEARING ON SUCH NOTICE OR MOTION INITIATING A CONTESTED MATTER IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 5, 2019, a true and correct copy of the foregoing was served on all parties in interest listed on the mailing matrix by ECF and/or regular mail.

/s/Monte J. White